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Attorneys for Plaintiff David M. Greco, *individually and on behalf of others similarly situated*

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

**David M. Greco,
*individually and on behalf of others
similarly situated,***

Plaintiff,

vs.

**Gurbir S. Grewal,
*New Jersey Attorney General, et al.,***

Defendants.

**Civil Action No. 3:19-cv-19145-BRM-TJB
Honorable Brian R. Martinotti, U.S.D.J.
Honorable Tonianne J. Bongiovanni, U.S.M.J.**

NOTICE OF MOTIONS

**TO: Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
Newark Vicinage
United States Court House
Newark, New Jersey 07102**

**Robert McGuire, Deputy Attorney General
Simone Frey, Deputy Attorney General
Bryan Lucas, Deputy Attorney General
Office of the New Jersey Attorney General
R.J. Hughes Justice Complex
Trenton, New Jersey 08625**

Attorneys for Defendant Gurbir S. Grewal
Bryan Lucas, Deputy Attorney General
Office of the New Jersey Attorney General
R.J. Hughes Justice Complex
Trenton, New Jersey 08625
Attorney for Defendants Jared M. Maples and New Jersey Office of Homeland
Security and Preparedness

Howard L. Goldberg, Esq.
First Assistant County Counsel
Office of the Camden County Counsel
Courthouse - 14th Floor
520 Market Street
Camden, New Jersey 08102
Attorney for Camden County Prosecutor's Office, Jill S. Mayer and Nevan Soumails

Vincent P. Sarubbim Esq.
Daniel DeFiglio, Esq.
Archer & Greiner, P.C.
33 East Euclid Avenue
Haddonfield, New Jersey 08033
Attorneys for Defendants Gloucester Township Police Department, Bernard John
Dougherty, Nicholas C. Aumendo, Donald B. Gansky, William Daniel Rapp and Brian
Anthony Turchi

SIR/MADAM:

PLEASE TAKE NOTICE that on a date and time to be fixed by the Court that the undersigned, attorney for Plaintiff David M. Greco, will move before the Court seeking an Order granting the following forms of relief:

- An Order certifying the matter as a “*Rule 23(b)(3)* Class Action” and specifically defining the “Certified Class”;
- An Order appointing Plaintiff David Greco as “Class Representatives”;
- An Order appointing Albert J. Rescino, Esq. of Ocean Township (Monmouth County), New Jersey, as “Lead Class Counsel”;
- An Order approving the initial proposed “Class Notices”;
- An Order approving the initial proposed “Plan of Providing Notice”; and

- An Order commencing the providing of Notice of the pendency of this Class Action in the form and in the manner requested; and

PLEASE TAKE FURTHER NOTICE that at such time and place that the Plaintiff shall rely upon the MEMORANDUM OF LAW, the Declaration of David M. Greco and the Declaration of Albert J. Rescinio, Esq. with Exhibits, all submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

s/ Albert Rescinio

DATED: Jan. 10, 2020

ALBERT J. RESCINIO, ESQ.
ATTORNEY FOR PLAINTIFF DAVID M. GRECO

PROOF OF SERVICE:

ALBERT J. RESCINIO, ESQ. hereby certifies as follows:

1. I am the attorney for the Plaintiff in the within matter.
2. On today's date I caused copies of the moving papers to be filed electronically with the Clerk of the District Court and served on all parties electronically as per *Rules of Court*.

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED THIS 10th DAY OF JANUARY 2020.

s/ Albert Rescinio

DATED: Jan. 10, 2020

ALBERT J. RESCINIO, ESQ.